

EXHIBIT 54

Message

From: Pat Wolf [pat.wolf@gnetsofoconee.org]
Sent: 12/31/2015 6:29:07 PM
To: Deborah Gay [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d2c7a5a23a44197b503536d51a29d1a-Deborah Gay]
Subject: As requested
Attachments: GNETS Strategic Plan Year 4 -Recommendations from Wolf.doc

Hi Debbie!

I apologize for this late response and hope it helps. I highlighted my recommendations in yellow and put some comments in red. The rest looks good to me. Please let me know if you need anything else.

Hope you have a Happy New Year!

Pat

Pat Wolf

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Happiness does not depend on outward things, but on the way we see them. -Leo Tolstoy

From: Deborah Gay <DGay@doe.k12.ga.us>
Sent: Monday, December 28, 2015 10:04 AM
To: Pat Wolf
Subject: A request

Pat – I hope you have had a good holiday and don't know if you will see this until next week. However- I would appreciate your review of the attached update of the GNETS strategic plan for accuracy and to add any additional information you may have. The DOJ has given us an opportunity to share improvements and progress on the strategic plan. I have updated based on the information Sandy provided to me – Of course I need this back ASAP - Thank you, Debbie

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Dr. John D. Barge, State School Superintendent
"Making Education Work for All Georgians"

Georgia Network for Educational and Therapeutic Support (GNETS)

Strategic Plan Update Year 4

December 1, 2015

Introduction

The Georgia Network for Educational and Therapeutic Support (GNETS) is comprised of 24 programs which support local school districts' continuum of services for students with disabilities, ages 3-21. The programs provide comprehensive educational and therapeutic support services to students who might otherwise require residential or other more restrictive placements due to the severity of one or more of the characteristics of the disability category of emotional and behavioral disorders (EBD).

This strategic plan addresses recent audit findings, recommendations from stakeholder meetings, and general improvement strategies the Georgia Department of Education (GaDOE) has been addressing over time with the network. As part of the general improvement strategies, GaDOE has conducted stakeholder meetings with individual groups representing GNETS directors, special education directors, fiscal agents for GNETS, school superintendents, parents and others. Surveys to gather additional information were distributed to local special education directors and fiscal agents. The strategic plan embodies input from these sources and focuses on seven major areas including; (1) program operations (2) accountability, (3) student placement, (4) therapeutic interventions and supports, (5) educational programs, (6) program funding and (7) location of programs and service areas. Workgroups including GNETS staff, GaDOE staff and other relevant stakeholders will oversee the progress towards meeting identified goals and activities in each of these areas. The plan is currently structured around a three year timeline aimed at completing the identified goals by FY15. Year one of the strategic plan focuses on gathering data, evaluation of current resources in all 24 GNETS programs, piloting innovative activities in designated programs and laying a foundation for the work in year two. Year two of the plan will focus on the professional learning required to assist each program to implement the identified core array of services. Additional focus in year two will be the identification of data elements needed to create a funding formula to support core services to local school districts. Year three of the strategic plan will focus on implementation of services designed to meet the needs of the students in the local school district.

A Steering Committee advised the GaDOE on the development of specific strategies, timelines, and accountability for student results outlined in the strategic plan. Representatives from the GaDOE, GNETS director group, RESA directors, superintendents, local district special education directors, parents and partner agencies were represented on the Steering Committee. The strategic plan is the road map for implementation of the vision for the network.

Vision and Purpose of the Network

GNETS is a network of services provided to local school districts. The vision of State School Superintendent, Dr. John D. Barge, to make education work for all Georgians, is the vision of this strategic plan. (Should this be changed to Richard Woods?) GNETS is a service and not a place and is designed to be a support program for students to address the interfering emotionally-based behaviors that have disrupted the education of the child. The GNETS Program provides an array of therapeutic and behavioral supports as well as specialized instruction for students who exhibit emotional and behavioral disorders. These supports are designed to assist the student to progress in the general curriculum and graduate ready.

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for work or post secondary studies. In addition, the GNETS program provides supports to families and works collaboratively with other agencies serving these students.

The vision and purpose of the GNETS program will be realized through a *Core Array* of Services. These services will be made available to support local school districts in serving students with emotional and behavioral disorders. In addition, some services will be provided directly to students and their families in a GNETS program or in the LEA classroom. These indirect and direct services include but are not limited to the following:

GNETS Core Array of Services

- Professional learning to improve student outcomes
- Behavioral support consultation
- Family/Community supports and collaboration
- IEP placement in a GNETS classroom as determined by an IEP Team and reviewed at least annually
- Comprehensive reintegration support for students

I. Program Operation

The GaDOE provides to each GNETS program, GNETS fiscal agent, local school district, and other stakeholders a GNETS program operations manual that clearly describes program responsibilities and fiscal operations. This manual is designed to ensure that GNETS programs operate efficiently, effectively, and consistently throughout the network to support local school districts in providing students with educational opportunities that will enable them to become college and career ready.

Goal 1: The GaDOE will revise the GNETS program operations manual that describes efficient, effective, and consistent program management throughout the network on an annual basis.

Action Step	Resources & Partners	Person Responsible	Timeline (Start/Completion Date)	Data	Status
1. Revise and update GNETS operations manual annually.	GaDOE GNETS Fiscal Agents GNETS Directors	GaDOE	June 2012 - June 2013 November 2013	Stakeholder feedback	Operational-updated annually

II. Student Services and Therapeutic Supports

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The IEP Team may identify that a student requires a service in the identified GNETS *Core Array of Services*. In order to build capacity to serve students and to offer a full continuum of services, GNETS programs and local school districts will be encouraged to develop collaborative partnerships to adequately fund services for students with very high frequency and intense behaviors. These students may include those with emotional and behavioral disorders, autism and other developmental disabilities. Other eligible students with disabilities may be provided services through the GNETS program, which may include GNETS classes, when the frequency, intensity and duration of their behaviors is such that this placement is deemed appropriate by their Individualized Education Program (IEP) teams. Students who are served in GNETS classes are those requiring the intensive therapeutic interventions and educational support that GNETS programs are designed to provide. Students placed in GNETS classes must have exit criteria developed upon entrance.

All GNETS programs will become proficient in delivering consultation and professional learning to support local school districts in providing students with evidence based strategies and behavioral interventions. GNETS programs will do this by providing the Core Array of Services to assist local districts in supporting students with significant emotional and behavioral disorders. The expertise of GNETS staff will be used to enhance outreach and consultation services to local school districts on an on-going basis. GNETS programs will provide the coordination of services to support students as they exit GNETS programs and services.

GaDOE will collaborate with interagency partners (i.e. the Department of Behavioral Health and Developmental Disabilities) to ensure that eligible GNETS students have access to mental health services through a system of care.

Goal 2: All GNETS programs will implement evidence based therapeutic practices and will monitor for fidelity of implementation and student impact through the Core Array of Services. GNETS placement decisions will be based on data and documentation of student progress in specialized instruction, behavioral interventions and individualized student needs for (a.) initiation of services and (b.) exit from GNETS.

Action Step	Resources & Partners	Person Responsible	Timeline (Start/Completion Date)	Data	Status
1. Each GNETS program will develop a team with expertise in FBA and BIP.	GaDOE GSU Center for Leadership in Disability	GaDOE Coordinator GSU Staff	October 2012 June 30, 2015	List of personnel completing training 23 of 24 programs participated in FY13, FY14, FY15	Year One of training during FY13. The training and technical assistance continued through FY15.
2. Each GNETS will participate in training	GaDOE GSU Center for	GaDOE Coordinator GSU Staff	August 2013	List of personnel completing training.	Completed

designed to build skills to deliver PL in FBA and BIP.	Leadership in Disability		June 2015		
3. GNETS personnel will provide professional learning to LEA on the <u>process</u> of conducting Functional Behavior Assessments and Behavioral Intervention plans to assure that positive behavior supports are provided.	GaDOE GNETS Directors Trained GNETS staff Special Ed. Directors	GNETS Directors	January 1, 2014 June 30, 2015	Professional Learning Records	Implementation Stage through Core Array of Services Plans during FY14, FY15 18 of 24 have delivered PL to their partner districts.
4. GNETS personnel will receive initial training or refresher training in Life Space Crisis Intervention.	GNETS Trainers GaDOE	GNETS Directors	Annually	Verification in Annual Grant application- Five staff members completed and received certification as trainers in Spring 2015.	Completed during FY13. FY14, FY15 refresher training to occur in June of each year.
5. Personnel from each GNETS program will participate in the ANCA project. This project is a collaboration between GaDOE and Marcus Center aimed to support the administration the Assessment of Basic Language and Learning Skills (ABLLS)	GaDOE The Marcus Institute	GNETS Directors	June 30, 2013	List of personnel and attendance records	Completed During FY13, participated in ANCA project. By FY14, all GNETS programs will have personnel trained to administer The Assessment of Basic Language

used to develop IEP goals and monitor progress for students with autism.					and Skills (ABLIS).
6. Increase collaboration with interagency partners ensuring GNETS memberships on Regional Interagency Planning Teams (RIPT).	GaDOE Interagency Partnerships	GaDOE	July 1, 2011- June 30, 2015	Formal Agreements through IDT	Ongoing
7. Develop formal agreements with interagency partners to ensure that students receive mental health services through a system of care.	GaDOE Interagency Partnerships	GaDOE	July 1, 2011 June 30, 2015	Formal Agreements	Ongoing 20 of 24 programs participate in the LIPT meetings.
8. Identify evidence based strategies and interventions for students with emotional and behavioral disorders served through GNETS programs.	GaDOE Interagency Partnerships	Workgroup Leader	September 2011 January 1, 2012	List of evidence based practices identified created and shared with GNETS directors.	Completed January 1, 2012 GNETS Programs participated in a pilot program with GSU during FY12. As a result, a rubric was developed that identified and evaluated Evidence Based Practices. All GNETS were provided a copy

					of the rubric. The GNETS WIGGIO allows for easy access to materials.
9. Develop and implement a pilot project with GNETS programs on the implementation and evaluation of Evidence Based Practices (EBP).	GaDOE Interagency Partnerships	Workgroup Leader	January 1, 2012 June 30, 2013	SWIS Self-Assessment	Pilot project completed during FY12. Follow up work session at IDEAS June 2014.
10. Implement a network wide plan for the delivery of EBP for social emotional growth, with fidelity.	GaDOE Interagency Partnerships	Workgroup Leader	July 1, 2013 June 30, 2014	SWIS Self-Assessment	PBIS DTORF-R LSCI Operational
11. Each GNETS program will maintain a certified YMHFA (Youth Mental Health First Aid) Instructor to train all GNETS Staff and support systems as needed in YMHFA training.	GaDOE GNETS Directors GNETS Trainers	GNETS Directors	September, 2015 all programs have a certified training. Annually thereafter	YMHFA Evaluations Sign-In Sheets Certification Verification	Completed Training recertification annually as needed.

III. GNETS Instructional Services

All students directly served through GNETS programs must receive instruction in grade level curriculum delivering the Common Core Georgia Performance Standards (CCGPS). Teachers in GNETS programs should all be proficient in the delivery of instruction in CCGPS, in addition to specialized instruction to meet the academic needs of their students.

Goal 3: Students receiving services through GNETS programs will demonstrate proficiency on statewide assessments in order to enable them to become college and career ready.

Action Step	Resources & Partners	Person Responsible	Timeline (Start/Completion Date)	Data	Status
1. Identify the specialized academic instruction, including technology, currently provided by GNETS programs.	GaDOE GLRS LEA	Workgroup Leader	July 1, 2011 June 30, 2012	Survey results	Survey completed in FY12.
2. Using the components of the school improvement process, develop a plan for improving instruction in all GNETS Programs.	GaDOE GaDOE School Improvement RESA	Workgroup Leader	July 1, 2011 June 30, 2012	Student academic data	All GNETS program leadership have been certified in the Teacher Keys Evaluation System and will pilot with teachers in FY13. All will be fully operational in the TKES/LKES in the 2014-2015 school year.
3. Implement the plan for improving instruction for all GNETS students through collaboration with LEA and GLRS.	GaDOE GaDOE School Improvement RESA LEA	Workgroup Leader	July 1, 2012 June 30, 2014	Student academic data	Operational- GNETS participate in Professional learning in LEAs and at RESAs.

IV. GNETS Funding

GNETS is currently funded by a separate line item in the annual state budget and through the use of federal funding. A formula is used by GaDOE to determine individual program funding based upon a cumulative count of student placement each year. A three year average is used to arrive at the final funding figure for programs to mitigate any impact of major fluctuations in student counts from year to year for each program.

As part of this strategic plan the funding formula should be reviewed by stakeholders and revised as necessary to support the goals and action steps in the strategic plan. Funding for GNETS programs should ultimately support local school districts in providing students with educational opportunities that will enable them to become college and career ready. Stakeholders should consider outreach programs to local school districts and staff for therapeutic interventions when reviewing and making recommendations for revisions to the funding formula.

Goal 4: Develop a funding formula to support the implementation of the strategic plan to include a full array and continuum of services and to ensure efficient operation of the GNETS programs and services.

Action Step	Resources & Partners	Person Responsible	Timeline (Start/Completion Date)	Data	Status
1. Coordinate with all workgroups to identify essential funding needed to implement the strategic plan recommendations.	GaDOE GNETS Fiscal Agents	Workgroup Leader	July 1, 2011 June 30, 2012		The Core Array of Services was established.
2. Develop a proposal to revise the current funding formula to implement the strategic plan.	GaDOE Finance and Budget Office	Workgroup Leader	July 1, 2012 June 30, 2013		Draft of revised formula completed in fall of 2013.

The funding formula was revised to reflect a 3-year rolling average which was completed _____. Other revisions to the current funding formula are still being considered (ie. Taking into consideration service areas, rural vs. urban areas, etc).

V. Location of GNETS Programs and Service Areas

GNETS programs should be located where students have access to age appropriate peers, general education classes, and all of the resources provided to their peers such as technology, media centers, etc. High school students must have the opportunity to earn the credits needed to prepare them for success in postsecondary education and/or the 21st century workplace. The students served through the GNETS programs must be provided instruction for the number of hours required for all public school students in Georgia. The GNETS stakeholder committee shall review the service areas of each program and make recommendations for revised catchment areas.

Goal 5: Establish the location of service areas to ensure that services are delivered in an effective and efficient manner.

Action Step	Resources & Partners	Person Responsible	Timeline (Start/Completion Date)	Data	Status
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1. Examine data related to the current service areas established for each GNETS program.	GaDOE	Workgroup leader	July 1, 2011 June 30, 2012	2010 census data GaDOE SWD data	Completed.
2. Coordinate with all workgroups to identify service areas needed to implement the strategic plan recommendations.	GADOE	Workgroup leader	July 1, 2011 June 30, 2012		Action deleted. Service areas will remain intact due to state statute.

VI. Accountability

By Georgia law, GNETS is a network of programs, not a school or school district, therefore the ultimate accountability remains with the local educational agency (LEA). The development, review, and revision of the student's Individualized Education Program (IEP) are shared responsibilities between the LEA and the GNETS program. The IEP is developed to address the needs of the student for academic, social, behavioral, functional and developmental supports as well as access to and progress in the general curriculum.

Prior to FY10, each GNETS director submitted an annual Report Card of Accountability to the GaDOE which included data on students served, including demographic information, performance on academic assessments, progress on social-emotional behavior, family participation, and other program level data. In FY 10, GaDOE instituted a new student level data collection process utilizing the statewide student information system that provides data for each student served in GNETS classes. These data can be disaggregated to develop GNETS program data and reports. Annually, the GaDOE will provide GNETS directors a performance summary for each program with data gathered through the program level file at the GaDOE.

Goal 6: Annual performance data from each of the 24 GNETS Programs will be used to evaluate program effectiveness and to guide improvement activities.

Action Step	Resources and Partners	Person Responsible	Timeline (Start/Completion Date)	Data Source	Status
1. Analyze data points to determine any additional data to	GaDOE Data Collections	Workgroup leader	July 1, 2011	Program level file	Decision to implement

be collected or whether existing data collection is an effective measure of the services provided.			Completed by June 30, 2014	Assessment file	DTORF-R beginning in FY13.
2. Design final performance summary report to include any additional data, as recommended.	GaDOE Data Collections	GaDOE	July 1, 2012	Program level file Assessment file	Completed
3. Produce a guidance document on using GNETS data for program improvement. (SWIS, DTORF-R, SAM, STEEP, GCIMP, etc.)	GaDOE Data Collections	GNETS Directors	Extended to June of 2016	Program level file Assessment file	In progress

I am concerned that we don't have something more solid to report here. We do have the annual report data that GaDOE Collections provides which includes information about attendance, disability and academic progress. I think #3 should be extended to June of 2016 so that we can pull this together appropriately.